

NEW JERSEY STATE DEPARTMENT OF ENVIRONMENTAL PROTECTION

MEMO

TO File
FROM Red Rutkowski *JR* DATE 8/28/84
SUBJECT ORBIS Products Corp. Subsidiary of Norda Inc. Newark, NJ, EPA ID NO.
NJD 010 910 099

On Monday, August 20, 1984, from 1000 to 1330 hrs., a site visit and inspection was conducted at the above referenced facility. The following named persons were involved:

Bill Amaducci - Manager, ORBIS Products
Al Devagelli - Prod. Supv., ORBIS Products
Bob Friedman - Ind. Hygienist, Essex Co. Dept. of Health
Joe Hoyle - DWM, BFO, CFO
Red Rutkowski - DWM, BHWE

A RCRA inspection was completed by BFO and a site inspection taking approximately two (2) hours was conducted.

Background:

Orbis Products Corp., Newark, is a subsidiary of Norda, Inc. Norda has facilities in Boonton and East Hanover, NJ. All three facilities are listed as being involved in Aromatic Chemicals, Pharmaceuticals, organic intermediates, fragrances and flavors.

At the time of the 8/20/84 visit, the Newark facility was staffed by four people and it was reported that operations had ceased in late 1983 due to foreign competition. It was also reported that Norda had similar operations in Mexico City.

The current activity was described as selling off existing inventory, limited blending of inventory items, and the cleaning up of the site. It was stressed by Orbis that the cleanup was not to be construed as a closure as the facility was reported as capable of resuming operation either by Orbis or a new owner.

The facility has been listed by the NJDEP as a TSDF (category 3) and is shown in the RCRA-HWDMS read out as a generator only. The design capacities are listed in the 11/19/80 Part A notification as T01 (tank treatment) of 500,000 gallons per day and S01 (container storage) of 5,500 gallons.

BHWE files reveal that the facility requested delisting in a June 16, 1981 letter to EPA on the basis of (a) operating a simple waste water neutralization tank existing to a POTW (Passaic Valley Authority) and (b) the ninety (90) day drum storage exemption. No record of a reply can be found.

Additionally, reported on 8/20/84 was that when the plant was operating, the oils separated (skimmed) during the waste water treatment were stored and fed as supplemental fuel to the plant's three boilers.



As an added point, Orbis indicated a total tank capacity at the site of approximately 400,000 gallons.

Prior involvement from Field Operations and the Newark Health Department began apparently when a neighborhood complaint was received relative to an accumulation of drums in a warehouse on the edge of the site (5/24/84 odor complaint response from Newark Health Dept.).

Site Discussion:

Prior to the site tour and inspection, a meeting and paperwork review was conducted. It appeared that many of the records associated with the plant operation had been transferred to the Norda operations. Preparedness and prevention, contingency plans, and emergency procedures, and personnel training documents were not available.

Several manifests were reviewed by BFO. These did not appear to be a complete manifest file. The facility requested blank manifests and thirty-five (35) were mailed by the writer on 8/21/84 with instructions and listed contacts in the manifest section for future activity.

The facility was questioned as to the future status of the site and the Orbis personnel indicated they were uncertain and stated that a decision was to be made at a management meeting scheduled for August 21, 1984. The options indicated were that the operation would either close, remain open and again commence operation, or be purchased by another owner who would probably commence operations as previously performed. No immediate potential buyer was mentioned.

Orbis maintained that the cleanup operation was not a closure mechanism and contended that most of the residual wastes were not hazardous. Orbis was advised that the contention must be substantiated by analysis and classification procedures and that all wastes would be considered hazardous until nonhazardous verification was provided by Orbis. On 8/20/84, the writer mailed a list of State certified laboratories to Orbis to select for use in the analytical process.

As closely as could be ascertained, the primary wastes generated are the still bottoms from batch processes. These wastes are viscous, dark colored and tend to gelatinize upon standing. They were reported as containing various aldehydes and manganese salts.

Site Inspection:

The entire facility was inoperative including the three boilers. These are blue seal operated units, two of which were estimated at 25,000,000 BTU per hour capacity. The various process areas were visited and there was evident a fair degree of dismantlement. Piping and equipment appurtenances were on skids and pallets. Orbis reported that some equipment had been sold. The general housekeeping appearance was considered as average with evidence of tidying the various areas by stacking in orderly rows the various blend tanks, containers and bins.

There were three tanks cited as being involved in the storage of waste fuels approximately 10,000 gallons each. These were concrete diked to about four foot height.

Several areas were noted with drums stored neatly on their sides and appearing empty (metal drums and large plastic carboys).

Two main areas of concern were as follows:

The waste water treatment unit consisted of a ground level concrete structure about 8 feet deep, 20' x 40' with sectionalized covers which could be moved easily. It consisted of two sections with the first used as a skimmer and the second having central agitation. This unit fed to the sewer line outfall. It was reported by Orbis that the unit consisted of a pH control operation. The waste stream is acidic in nature and sodium hydroxide solution is metered to the unit to neutralize same. The facility reported the generation of very small quantities of sludge.

At the time of the site visit, the unit was not operating and it appeared that it had not been in operation for some time. It was filled to a depth of approximately six (6) feet with a brown colored sludge. The composition of the sludge was not available from Orbis records. The estimated quantity was 37,000 gallons. Orbis was advised to classify and dispose of the sludge and a notice of violation was issued to that effect.

The second area of concern consisted of the warehouse in which were stored approximately 1,200 drums of the previously described still bottom residues. The warehouse had been badly vandalized (all windows broken) and the drums were exposed to the elements and overhead leaks. They were stored three high on pallets with little or no identification with no regard for aisle space to identify drums in the center of the storage area. Several areas of leaking drums were found and brought to Orbis' attention. As a portion of this area, Orbis had begun to use over pack drums apparently to contain the leakers. These also did not exhibit identification of contents. Two notices of violation were issued. The first to provide identification plus aisle space and the second to provide preparedness and prevention to minimize the possibility of fire or unplanned releases of hazardous waste to air, soil, and surface waters.

The laboratory section was viewed and there was evidence of lab packs being prepared in fibre drums for disposal of these items. The labs had been stripped of equipment and appeared about 95% closed with only lab chemicals being packed (2-3 drums).

Additionally observed was a 6,500 gallon tank wagon being loaded with waste fuel oil previously described in this memo. The facility reported that this would be manifested to an approved disposal site.

There was not too much evidence of bulk (tank storage) of product or raw materials. One area, next to the powerhouse contained drum raw materials, intermediates, and product which appeared properly labeled.

As a final note, Joe Hoyle phoned the writer on August 23, 1984 and reported that he had been contacted by Bill Amaducci that the management at Orbis/Norda had decided to commence operations and had further determined to put on immediately two additional people to accelerate the cleanup.

Recommendations:

1. The facility is a TSDF and should be compelled to bring the regulatory status to that of an existing facility through the use of an administrative consent order. Consideration should be given to calling in the Part B as an additional facet of the action.
2. Enforcement and Field Operations should determine the company (corporation) position through certification by the company on its present activity as a cleanup and secure official determination on future activities at the site.

EP5/slw